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September 19, 2005

2005 OCT 3 AM 10 51

Mr. John F. Carter
Regional Director
Federal Deposit Insurance Corporation
25 S. Jessie Street at Eker Square, Suite 2300
San Francisco, CA 94105

Re: Wal-Mart Stores, Inc. FDIC Application #20051977

Dear Mr. Carter,

I am writing on behalf of our bank to comment on the Wal-Mart Stores, Inc. application for a Utah industrial bank or industrial loan company charter (ILC) and federal deposit insurance. **We oppose the application and urge the FDIC to deny the application.**

We are a small independent bank and operate in small hometown communities. We know Wal-Mart has a history of de-stabilizing communities by driving local companies out of business. Because of this common history and experience of many communities, when evaluating the application we urge FDIC to consider what will happen to credit availability and customer and community service when the Wal-Mart bank siphons deposits from locally-owned and operated community banks, impairing their ability to continue to support economic growth and development in their communities through lending and driving them out of business.

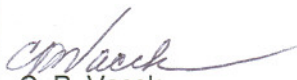
Consumers and households likewise will be ill-served by a Wal-Mart bank. Local banks, just like local retailers in towns where Wal-Mart has located, will no longer be able to compete. While the initial effect may be cheaper services at the Wal-Mart bank, the long-term effect will be reduced choices for consumers as the number of financial services providers shrinks, and as the products become more commoditized.

A Wal-Mart owned bank will not be able to look at other factors beyond a consumer's credit score to understand the customer's individual circumstances and cannot make the customer a loan based on a long-standing relationship and personal knowledge of the customer—something community banks do every day.

There is the danger that Wal-Mart will export deposits out of the local community. This has been the current pattern of the large retailer when it establishes itself in a local community. The retailer's deposits do not stay with local banks, but rather are transferred to the store's central headquarters. This pattern in the past has had a devastating effect on local communities as retail dollars spent in the community are exported elsewhere and do not remain in the community to support local lending and economic development.

Again, we urge FDIC to **reject** Wal-Mart's application for federal deposit insurance for a Wal-Mart ILC. The threat of community disinvestment is particularly acute in this case because of Wal-Mart's track record and destructive impact in hundreds of communities across the United States.

Sincerely,


C. R. Vacek
President & CEO